



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

February 17, 2009

Mr. James Sullivan  
U.S. Department of the Navy  
BRAC Program Management Office – West  
1455 Frazee Rd., Suite 900  
San Diego, CA 92108-4310  
james.b.sullivan2@navy.mil

**Subject: Draft Interim Remedial Investigation Report, Installation Restoration Site 11, Yerba Buena Landfill, Naval Station Treasure Island**

Dear Mr. Sullivan:

EPA has reviewed the Draft "Interim" Remedial Investigation (RI) for Site 11, Yerba Buena Landfill and comments submitted by the California Department of Toxic Substances Control (including HERD) and the San Francisco Bay Regional Water Quality Control Board. Site 11 has been partially transferred to Caltrans for use during bridge construction, which has potentially resulted in site disturbance. The RI for Site 11 reports on pre-transfer site conditions, with the understanding that further investigation may be necessary prior to initiating remedial action. Upon review of the subject document and agency comments, EPA has the following additional comments/questions:

1. General comment on figures: Does the table on the figure include all samples collected for the potential contaminant or only those found to exceed background/screening criteria for the subject analyte? It is unclear from the figures whether extent was delineated.
2. Bridge/Land use: Will Caltrans transfer the land back to the Navy upon completion of the bridge (it is unclear if the "south/south detour" is a permanent feature and it is assumed that the "staging area" is temporary)? If Caltrans is the permanent property owner, references to potential uses listed in the 1996 Reuse Plan (e.g., day care center) are no longer valid. Why are such uses being considered in this document?
3. Point Paper for Site 11 Boundary Adjustment. Is the Coast Guard property located within the boundaries of the dump that was identified in the 1935 topographic map? It is unclear if the term "landfill" is defined according to the results of trenching/boring investigations or previous evidence.
4. Section 1.3.8 Intertidal Sediment Investigation, Page 1-12: The document states that the Navy collected additional samples to address concerns about PCBs in sediments adjacent to Site 11. The text and tables include PCB and TPH data from sediments and discuss the screening criteria that were used. Were the sediments sampled historically for other contaminants of concern (e.g., metals, pesticides)?

5. Section 4.2.1 Volatile Organic Compounds, Page 4-4: This section includes a statement that "acetone and methylene chloride were detected in a few samples and are common lab contaminants." Was this assumption confirmed in the lab?
6. Section 4.2.1 Volatile Organic Compounds, Page 4-4: VOCs were detected in soil at Site 11. As recommended by DTSC (Jan 14 letter from R. Miya), soil gas samples should be collected to assess human health risk and to characterize the site adequately.

Please contact me with any questions related to this review at (415) 972-3112.

Sincerely,



Christine Katin  
Remedial Project Manager

cc (e-mail): Ryan Miya, Ph.D., Department of Toxic Substances Control,  
RMIya@dtsc.ca.gov  
Ross A. Steenson, PG, CHG, San Francisco Bay Regional Water Quality  
Control Board, rsteenson@waterboards.ca.gov  
Charles Perry, P.E., U.S. Navy, charles.l.perry@navy.mil  
Gary R. Foote, PG, AMEC Geomatrix, Incorporated,  
gary.foote@amec.com